

materials. Thus, the rejection of the claims over *Shuchart* is traversed. Reconsideration is respectfully requested.

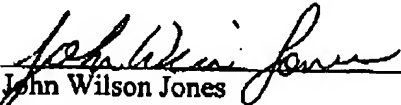
Examiner's Rejection Over *Lybarger*. The Examiner has further rejected Claims 1-4, 6-8, 10-12, 16, 17, 20-26, 28 and 29 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 3,868,996 ("*Lybarger*"). This ground for rejection is also traversed.

Lybarger discloses the use of an aqueous organic acid liquid containing a fluoride salt. In *Lybarger*, the viscous fluid containing the weak organic acid and fluoride salt is used to emplace a slurry of particles that form a sand or gravel pack in or around a perforated casing in a wellbore. (col. 1, ll. 20-23). The aqueous organic liquid composition is further disclosed in col. 2, ll. 20-43. As set forth therein, the aqueous liquid contains "at least one each of a fluoride salt, a weak acid and a weak acid salt". As set forth in FIG. 1 and described in col. 6, l. 4 through col. 8, l. 24, slug 9, a preformed mud acid containing HCl and HF is first introduced followed by a spacer slug 10 of ammonium chloride. The aqueous liquid containing the fluoride salt, weak acid and weak acid salt, comprising the slug 11 is then introduced into the formation. Slug 12, the viscous solution which forms the inventive aspect of *Lybarger* is then introduced. Thus, both slugs 11 and 12 contain a fluoride salt *and* a weak acid. Subsequent to the introduction of slug 12, slug 13 is introduced which contains gravel packing particles suspended in the viscous solution. *Lybarger* does not disclose the use of an acid solution which is void of HF or a HF precursor. Neither does *Lybarger* disclose a process of removing carbonate materials or scaled depositions from a subterranean formation. In fact, carbonate materials and/or scaled depositions are not even referenced in *Lybarger*. The Examiner, is therefore, respectfully requested to withdraw the rejection of the claims over *Lybarger*.

Conclusion. The Examiner is requested to telephone the undersigned should he deem it prudent to expedite the prosecution of this application.

Respectfully submitted,

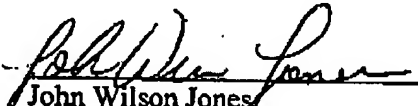
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CERTIFICATE OF TRANSMISSION, 37 C.F.R. § 1.6(d)

I hereby certify that this correspondence is being transmitted by facsimile, 571 273-8300, to Examiner Zakiya Nicole Walker c/o Commissioner for Patents, P. O. Box 1450, Alexandria, Virginia 22313-1450 on this the 3rd day of October 2005.


John Wilson Jones